

**From:** [Becky Weemes](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Proposed Regulation Comments - Prompt Corrective Action; Risk-Based Capital  
**Date:** Wednesday, May 28, 2014 10:47:51 AM

---

To: Regulatory Comments  
From: Rebecca Weemes  
CU\*South  
05/14/2014

Dear Mr. Poliquin:

I am both an employee of a CUSO and a member of a great credit union. Recently I came across a number of articles in credit union trade sites regarding a proposed regulation that the NCUA has formulated with respect to risk-based capital requirements. My understanding is that this proposal will affect both my employer and my credit union in a very negative way.

It seems that most industry professionals view this proposal as going way beyond what is necessary to protect the insurance fund, and consequence of limiting services to members.

It will also discourage credit unions from investing in CUSOs, which have provided credit unions with extensive benefits including, but not limited to, patronage dividends returns and reduced expenses as a result of cooperative bargaining on technology.

I hope you understand my concern that while both my CUSO and my credit union are very strong organizations, placing such a restrictive regulation on them will undermine the cooperative atmosphere and relationships all CUSO's embrace which makes them different from the rest of the industry. My recommendation is that the NCUA take this proposal off the table until such a time as a capital requirement regulation that meets the needs of the industry can be designed—and not one that's solely concerned with the health of your insurance fund.

Rebecca "Becky" Weemes

**Rebecca Weemes** | CU\*South | Manager Collections by Objective | **We Grow Credit Unions**  
P: 616.977.8100x 600 | T: 800.293.7554 | F: 251.281 2000 | [rweemes@cusouth.com](mailto:rweemes@cusouth.com) | **How am I doing? Let my supervisor know** [leo@cusouth.com](mailto:leo@cusouth.com)

The information contained in this message or any attached document is confidential and intended only for individuals to whom it is addressed. If you received this message in error, please inform me immediately. Then delete the email message and any attachments. Any unauthorized use, distribution, or copying of this information is prohibited.

*Improved New GOLD (ING) is right around the corner! [Learn more.](#)*